

JAP:DCW

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M-10-860**

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. § 952)

VOB COLAS,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL G. TZITZIKALAKIS, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about July 27, 2010, within the Eastern District of New York and elsewhere, the defendant VOB COLAS did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.


1. On or about July 27, 2010, the defendant VOB CALOS arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Air Jamaica Flight No. 17 from Kingston, Jamaica. After arriving at JFK, CALOS was referred to Customs and Border Protection ("CBP") officers for a routine inspection.

2. During the inspection, CALOS verified ownership of the one carry-on bag and one briefcase that he was carrying. CALOS also verified that he had packed the briefcase himself and the contents of the briefcase belonged to him. After noting the unusually thick walls and weight of the briefcase once emptied, CALOS was taken to another area for a secondary inspection.

3. During the secondary inspection, CBP officers probed the briefcase and found a powdery white substance. The powdery substance field tested positive for cocaine. Thereafter, CALOS was arrested.

4. The total approximate gross weight of the cocaine found in CALOS'S suitcase is 1,150.6 grams.

WHEREFORE, your deponent respectfully requests that the defendant VOB CALOS be dealt with according to law.

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MICHAEL G. TZITZIKALAKIS  
Special Agent  
U.S. Department of Homeland Security  
Immigration and Customs Enforcement

Sworn to before me this  
27th day of July, 2010